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June 28, 2004

Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

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SUBJECT: High Production Volume Challenge Program
Chemical Name: 1,3,5-Triazine-2,4,6 (1H,3H,5H)-trione, 1,3,5-tris(oxiranylmethyl)
CAS Reg. No.: 2451-62-9
Sponsors: Huntsman Advanced Materials
Nissan Chemical Industries, Ltd.

Dear Sir:

This letter is in response to your April 12, 2004 letter addressed to Ms. Lorraine Kapilow regarding our commitment to High Production Volume (HPV) Challenge Program for 1,3,5-Triazine-2,4,6(1H,3H,5H)-trione, 1,3,5-tris(oxiranylmethyl) [CAS Reg. No.: 2451-62-9]. This chemical substance is also known as Triglycidylisocyanurate (TGIC).

Background:

In 1999, the U.S. Environmental Protection Agency (EPA) prepared a draft report for Use and Exposure Information Project (UEIP) for Triglycidylisocyanurate (TGIC). When EPA initiated the HPV Challenge Program, Ciba Specialty Chemicals Corporation ("**Ciba**") committed to sponsor this chemical substance. This company later became Vantico and it is now known as Huntsman Advanced Materials ("**Huntsman**") which is a business unit of Huntsman International, LLC.

In October 2000, Nissan Chemical America Corporation through its parent company, Nissan Chemical Industries, Ltd. ("**Nissan**") notified the EPA that it will commit to HPV Challenge Program for the subject chemical substance. Please be advised that Huntsman (and its predecessors Vantico and Ciba) and Nissan have been working closely under a consortium for completion of the subject HPV project.

Update on the Dossier for TGIC:

Despite the delays due to a very late start and subsequent management changes in one of the member companies of the consortium as a result of acquisitions and mergers (see above), Huntsman and Nissan are now able to complete a major portion of the project. We wish to provide you the following update on this project.

- 1) We completed the preparation of a draft robust summaries for all the required data except product chemistry and environmental fate. The completed task represents about 75% of the total project.
- 2) We are currently updating the draft toxicology dossier to be consistent with the guidance provided by EPA for preparing Robust Summaries for HPV chemical substances.
- 3) Since we did not have a consortium number (Huntsman and Nissan are consortium members), we have recently received from EPA a Consortium Number (for Huntsman-Nissan-TGIC).
- 4) We are now working on the preparation of robust summaries for physical and chemical properties of TGIC.
- 5) We are evaluating the data on environmental fate for TGIC. We will use the EPIWIN model for developing the environmental fate data including fugacity. We will then complete the robust summaries for this section.
- 6) We will convert all the robust summaries data on TGIC in the current IUCLID format.

We would like to meet with EPA officials to discuss about the TGIC draft dossier because this chemical is of interest to EPA from OECD-SIDS point of view. After receiving the comments, we will finalize the Dossier for the subject chemical substance. We plan to complete all these tasks by September and submit it to EPA before the end of this year. We hope that the above information on the progress of HPV submission on TGIC by Huntsman and Nissan is acceptable to EPA.

Non-Participation of Other Companies in Consortium

We wish to bring to your attention that the TGIC is not manufactured in the United States and it is available through imports only. The TGIC imports by Huntsman and Nissan account for about 80% of the total imports. The remaining 20% is imported by other companies who are NOT participating in the HPV Challenge Program for TGIC. It is unreasonable for Huntsman and Nissan to bear the entire burden while other companies are allowed to import the subject chemical without participation in this program.

The Agency expects that all importers/manufacturers will participate in this voluntary program. The Agency has stated that those companies who do not voluntarily participate in the subject program will be subject to test rules under Section 4 of the Toxic Substances Control Act (TSCA). We urge that the Agency forces these companies to participate in the program so that they will NOT violate the spirit of the HPV Challenge Program and also they will share the costs with us for supporting the HPV program for TGIC.

On behalf of Huntsman Advanced Materials and Nissan Chemical Industries, Ltd. (Consortium Name: Huntsman-Nissan-TGIC; Consortium Number:), we are submitting this letter to give you an update on the HPV Challenge Program for the subject chemical substance. We sincerely thank you for your understanding. Please contact us if there are further questions.

Sincerely,

N. Bhushan Mandava, Ph.D., CPC, RAC
Agent for Nissan Chemical Industries, Ltd.

cc: Dr. Andy Wang (Huntsman)
Mr. Hiromu Ebizuka (Nissan)